

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No. 05-30046-KPN

ALICE W. HALPIN,

Plaintiff,

v.

RDC OF CONNECTICUT, INC.,
R.D. CLARK AND SONS, INC.,
KATELAND LEASING, INC.,
PINNACLE TRANSPORTATION, INC. and
CHINA GROVE TRANSPORT, INC.,

Defendants.

JOINT MOTION TO EXTEND DATES
UNDER PROCEDURAL ORDER

The Plaintiff, Alice Halpin, and the Defendants, RDC of Connecticut, Inc., et al., jointly request a one week extension from June 9, 2006 to June 16, 2006 for the date for filing a joint pretrial memorandum, any proposed voir dire questions, any pretrial motions, agreed upon instructions and form of special verdict, all as called for in the Court's Procedural Order dated February 2, 2006.

As grounds for this Motion, the parties state:

The parties have completed all discovery but for one additional deposition which is scheduled for June 14, 2006 at 10:00 AM concerning one element of damages. Discovery to date has consisted of interrogatories, request for production of documents, eight depositions, including one expert deposition. The parties have previously scheduled to meet for purposes of completing a pretrial conference report upon completion of the last deposition. The parties

have exchanged drafts of requested jury instructions as required by the Court's Procedural Order.

An extension of seven days will allow the parties to complete each of the items required by the Court's Order with the benefit of all depositions being completed.

Respectfully submitted,

ALICE W. HALPIN,

Plaintiff

By: Robert S. Murphy *mem.*
Her Attorney
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RDC OF CONNECTICUT, INC., R.D. CLARK AND SONS, INC., KATELAND LEASING, INC., PINNACLE TRANSPORTATION, INC. and CHINA GROVE TRANSPORT, INC.,

Defendants,

and

RDC OF CONNECTICUT, INC.,

Plaintiff-in-Counterclaim,

By: Michael E. MacDonald
Their Attorney
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Dated: June 7, 2006